

REMARKS

It is submitted that these claims, as originally presented, are patentably distinct over the prior art cited by the Examiner, and that these claims were in full compliance with the requirements of 35 U.S.C. §112. Changes to these claims, as presented herein, are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

Claims 1-13, 25, and 39-54 are in the application.

Claims 1-13, 25, and 39-54 were rejected under 35 U.S.C. 102(e) as being anticipated by Cheung et al. (hereinafter referred to as “Cheung”).

Amended independent claim 1 now recites in part the following:

“motion detection means for detecting **a motion vector for each pixel** of said image data;

area-motion detection means for detecting at least one motion in **an area having more than one pixel** in said image data, based on the motion vector for each pixel detected by said motion detection means....” (Emphasis added.)

It is respectfully submitted that the portions of Cheung relied on by the Examiner (hereinafter merely “Cheung”) do not disclose the above features of claim 1. As an example, it is respectfully submitted that Cheung does not disclose “...detecting a motion vector **for each pixel** of said image data,” as in claim 1. Instead, Cheung appears to disclose a motion vector for a macroblock. (See, for example, lines 28-29 of column 4 of Cheung.)

Accordingly, it is believed that claim 1 is distinguishable from Cheung. For similar reasons, it is also believed that amended independent claims 13 and 25 are distinguishable from Cheung.

Claims 2-12 and 39-54 are respectively dependent from one of the amended independent claims and, due to such dependency, are also believed to be distinguishable from Cheung for at least the reasons previously described.

In the event that the Examiner disagrees with any of the foregoing comments concerning the disclosures in the cited prior art, it is requested that the Examiner indicate where in the reference, there is the bases for a contrary view.

In view of the foregoing, entry of this amendment and these remarks and withdrawal of the rejection of claims 1-13, 25 and 39-54 and the allowance of this application with claims 1-13, 25 and 39-54 are respectfully requested.

Please charge any fees incurred by reason of this response and not paid herewith to Deposit Account No. 50-0320.

Respectfully submitted,
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